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*Of Attorneys for Defendants
Lake Oswego School District and
Lake Oswego School Board*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JOHN PARKS,

Plaintiff,

v.

**LAKE OSWEGO SCHOOL DISTRICT;
LAKE OSWEGO SCHOOL BOARD;
OREGON SCHOOL ACTIVITIES
ASSOCIATION; PORTLAND PUBLIC
SCHOOLS; and MARSHALL HASKINS,
individually and in his representative
capacity for OREGON SCHOOL
ACTIVITIES ASSOCIATION and
PORTLAND PUBLIC SCHOOLS,**

Defendants.

Case No. 3:24-cv-1198-JR

**DECLARATION OF DONNA WATSON
IN SUPPORT OF LAKE OSWEGO
SCHOOL DISTRICT AND LAKE
OSWEGO SCHOOL BOARD’S
OPPOSITION TO PLAINTIFF’S
MOTION FOR PRELIMINARY
INJUNCTION**

I, Donna Watson, do hereby declare as follows:

1. I am the Executive Director of Human Resources at Lake Oswego School District


(District) and oversee hiring and other personnel matters for the District and our component schools, one of which is Lake Oswego High School ("LOHS"). I make this declaration in support of defendants' Opposition to Plaintiff's Motion for Preliminary Injunction.

2. The District posted a job opening for the Fall 2024 cross-country head coaching position at LOHS on June 17, 2024. The position was kept open until July 18, 2024. The position has been filled. Plaintiff John Parks did not submit an application for that position.

3. The District posted a job opening for the Spring 2025 track head coaching position at LOHS on June 17, 2024. The position was kept open until September 20, 2024. The position has been filled. Plaintiff John Parks did not submit an application for that position.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 18th day of October, 2024.

By: 
Donna Watson

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of October, 2024, I served the foregoing

**DECLARATION OF DONNA WATSON IN SUPPORT OF LAKE OSWEGO SCHOOL
DISTRICT AND LAKE OSWEGO SCHOOL BOARD'S OPPOSITION TO
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION** on the following parties at
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Of Attorneys for Plaintiff

by electronic means through the Court's Case Management/Electronic Case File system.

/s/Taylor B. Lewis

Taylor B. Lewis